
From: Harrison, Frank <FHarrison@williamskastner.com>
Sent: Monday, June 14, 2021 9:05 PM
To: Andrew K. Glenn; Dale, Margaret A.
Cc: Pocha, Madhu; Mungovan, Timothy W.; APaslowsky@milbank.com; Olga L. Fuentes; Marissa E. Miller; Ingerman, Brett
Subject: RE: Ambac's Statements to the Court regarding Milliman Actuarial Reports
Attachments: Ltr. from A.Glenn to M. Dale 06112021 4837-3192-9582 v.2.pdf

Andrew:

Your attached June 11, 2021 letter misstates our meet and confer discussions in numerous ways, the most glaring of which I respond to here.

First, I never said "the Board" was "holding back" or asking Milliman to "hold back" on publishing the 2018 reports. Instead, I told you that the publication of the 2018 valuation reports was something out of Milliman's control, that I didn't know if or when Milliman would have more work to do on the 2018 report, and that you would need to ask Milliman's government client for more details. Everything beyond that is inference on your part. And "the Board" is not Milliman's client, so I don't know how you'd infer that I was referencing the Board from my suggestion that you needed to ask Milliman's client.

Second, I never said that anyone "instructed" Milliman to "withhold" the 2018 report from its production. I have also never said that Milliman is "holding back documents based on instructions." What I have said is that Milliman's client had expressed concern about the 2018 draft report being produced before it has been finalized. Although the 2018 reports have not been finalized, Milliman is considering Ambac's request to produce its underlying project files for the 2018 valuation reports and will get back to you separately on that issue.

Again, this is not an exhaustive list of misrepresentations Ambac has made. Milliman reserves all rights.

Frank

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WASHINGTON OREGON

From: Andrew K. Glenn <aglenn@glennagre.com>
Sent: Friday, June 11, 2021 2:13 PM
To: Dale, Margaret A. <mdale@proskauer.com>
Cc: Harrison, Frank <FHarrison@williamskastner.com>; Pocha, Madhu <mpocha@omm.com>; Mungovan, Timothy W. <tmungovan@proskauer.com>; APaslowsky@milbank.com; Olga L. Fuentes <ofuentes@glennagre.com>; Marissa E. Miller <mmiller@glennagre.com>; Ingerman, Brett <brett.ingerman@dlapiper.com>
Subject: Ambac's Statements to the Court regarding Milliman Actuarial Reports

Please see the attached correspondence.

Andrew K. Glenn
Managing Partner
Glenn Agre Bergman & Fuentes LLP
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New York, New York 10001

From: Dale, Margaret A. <mdale@proskauer.com>
Sent: Thursday, June 10, 2021 5:15 PM
To: Andrew K. Glenn <aglenn@glennagre.com>; Atara Miller <amiller@milbank.com>
Cc: Harrison, Frank <FHarrison@williamskastner.com>; Pocha, Madhu <mpocha@omm.com>; Mungovan, Timothy W. <tmungovan@proskauer.com>
Subject: Ambac's Statements to the Court regarding Milliman Actuarial Reports

[EXTERNAL EMAIL] This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Counsel,
Please see the attached correspondence.
Margaret Dale

Margaret A. Dale
Partner
Vice Chair, Litigation Department

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